

December 21, 2023

VIA ECF

Honorable Kevin P. Castel United States District Court Judge United States Courthouse Daniel Patrick Moynihan 500 Pearl St. New York, NY 10007-1312

Dear Judge Castel:

We write on behalf of Defendant Brijesh Goel to request a 30-day adjournment of his surrender date from January 9, 2024 to February 8, 2024. We have conferred with the Government and they consent to this request.

The reasoning behind the request is that Mr. Goel has not yet been designated to a facility and we understand there are currently delays in designating inmates. As a practical matter, this means that rather than surrendering to his designated facility (which Your Honor graciously recommended to be FCI Danbury (Low) or a similarly nearby facility) he would surrender to the United States Marshalls and have to begin his sentence at a temporary facility, likely the Metropolitan Detention Center Brooklyn, (MDC, Brooklyn). MDC Brooklyn, as Your Honor is aware, is a temporary facility that holds prisoners of all security levels. We are hopeful that Mr. Goel receives his designation in January and that he can report directly to the assigned facility.

Given the above, we respectfully request that Your Honor order Mr. Goel to surrender to his designated facility on February 8, 2024 to allow additional time for his facility to be designated.

Respectfully Submitted,

Adam Ford

Cc: all counsel of record (Via ECF)

ADAM C. FORD | NEW YORK • AUSTIN • MIAMI | P: 212.858.0040 | fordobrien.com